

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

PC CONNECTION, INC. d/b/a)
CONNECTION)
)
 Plaintiff) **Civil Action No. 1:22-CV-00524-LM**
)
 v.)
)
 PETER SILLICH)
)
 Defendant.)
)

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTON

Plaintiff PC Connection, Inc. d/b/a Connection (“Connection” or the “Company”) hereby moves for a preliminary injunction against Defendant Peter Sillich (“Sillich”), stating in support as follows:

1. Sillich, a former Connection sales employee, entered into an employment agreement (the “Agreement”) at the start of his tenure with the Company, and such Agreement contains a nonsolicitation covenant. Sillich’s employment with Connection ended on July 28, 2022. Sillich is now working as a sales representative for one of Connection’s direct competitors, Partner One IT, and in violation of the nonsolicitation covenant he has contacted his former Connection accounts to urge them to shift their business from Connection to Partner One. Despite Connection’s repeated warnings, Sillich has persisted in breaching the nonsolicitation covenant.

2. Connection now seeks a preliminary injunction to enjoin Sillich from soliciting or doing business with his former Connection accounts, in violation of the nonsolicitation covenant.

3. For the reasons set forth in Connection's accompanying Memorandum of Law, the Affidavit of Peg Murphy, and the pleadings and papers on file in this matter, all of which are incorporated herein by reference, Connection submits that preliminary injunctive relief, as set forth the Company's contemporaneously-filed Proposed Order, is warranted here.

4. Given the nature of the relief requested herein, Connection has not sought Sillich's assent prior to filing the instant Motion.

5. Pursuant to LR 7(d), Connection requests that the Court schedule oral argument on this motion. Connection submits oral argument will aid the Court's understanding of the facts and circumstances at issue.

WHEREFORE, Connection respectfully requests that this Honorable Court issue an Order:

- A. Scheduling a hearing at the Court's earliest convenience on the instant Motion;
- B. Granting Connection's Motion for Preliminary Injunction;
- C. Entering Connection's contemporaneously-filed Proposed Order; and
- D. Awarding such other and further relief as is deemed just and equitable.

Respectfully submitted,

PC CONNECTION, INC.,
D/B/A CONNECTION

By its attorneys,

Dated: December 21, 2022

/s/ Christopher H.M. Carter
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CERTIFICATE OF SERVICE

I hereby certify that on the above date a copy of the foregoing has been forwarded to all counsel of record via the Court's electronic filing system.

/s/ *Christopher H. M. Carter*
Christopher H.M. Carter